

1 Rajwinder Kaur
2 16 Virginia Rd.
3 Lake Grove, NY 11755
4 RoutinePayments@gmail.com
5 Plaintiff, In Pro Per

U.S. DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
2020 AUG 31 PM 1:25
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6 UNITED STATES DISTRICT COURT

7 EASTERN DISTRICT OF NEW YORK

8 RAJWINDER KAUR, an individual

9 as Plaintiff,

10 vs.

11 EQUIFAX, INC., a corporation; EQUIFAX
12 INFORMATION SERVICES, LLC, a corporation;
13 EXPERIAN INFORMATION SOLUTIONS, INC, a
14 corporation; TRANS UNION, LLC, a corporation;
15 and DOES 1-10, inclusive

16 Defendant(s).

Case No. CV 20-2614(JS) (AYS)

PLAINTIFF'S RULE 26(a)(1) DISCLOSURES

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AUG 31 2020

EDNY CLERK'S OFFICE

17 Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff, Rajwinder Kaur, ("Plaintiff"), in pro
18 per, makes the following initial disclosures.

19 **A. The name and, if known, the address and telephone number of each individual likely to have
20 discoverable information - along with the subjects of that information - that the disclosing party may
21 use to support its claims or defenses, unless solely for impeachment.**

22 Plaintiff has not yet discovered all individuals who may have discoverable, non-privileged
23 information that may support Plaintiff's claims in this case.

24 To date, Plaintiff has identified the following:

- | | |
|----------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| 25 1. Mark Begor, CEO
26 Equifax
27 1550 Peachtree Street, NW, H46
28 Atlanta, GA 30309 | Knowledge of company policies and
procedures. |
| 2. John W. Gamble, Jr., Corporate V.P.
Equifax
1550 Peachtree Street, NW, H46
Atlanta, GA 30309 | Knowledge of company policies and
procedures. |
| 3. Mike Rogers, Chairman | Knowledge of company policies and |

Experian
475 Anton Blvd
Costa Mesa, CA 92626

procedures.

4. Kerry Williams, COO
Experian
475 Anton Blvd
Costa Mesa, CA 92626

Knowledge of company policies and
procedures.

5. Christopher Cartwright, President & CEO
TransUnion
555 W. Adams Street
Chicago, IL 60661

Knowledge of company policies and
procedures.

6. John T. Danaher, Pres., Consumer: Interactive
TransUnion
555 W. Adams Street
Chicago, IL 60661

Knowledge of company policies and
procedures.

7. Plaintiff also reserves the right to cross-examine any and all witnesses identified by
Defendants, or any other party to this lawsuit.

8. Any employee, department head or corporate officer employed by Defendant(s) with
knowledge of company policies and procedures, or participating in the drafting of documents in
response to Plaintiff's correspondence, including a competent witness of:

Equifax
PO Box 740256
Atlanta, GA 30374-0256

Experian Disputes Office
PO Box 4500
Allen, TX 75013

TransUnion, Consumer Dispute Center
P.O. Box 2000
Chester, PA 19016

9. Plaintiff reserves the right to supplement her response to this disclosure.

**B. A copy or a description by category and location - of all documents, electronically stored
information, and tangible things that are in the possession, custody, or control of the party and that
the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

1. Correspondence sent by Plaintiff to Defendant attempting to resolve issues before litigation.
2. Information from Plaintiff's credit report(s) showing the Defendants failed to accurately report credit
information.
3. Evidence of Defendants' response to Plaintiff's request for full consumer file disclosure.
4. Evidence of Defendants' investigation, procedures and results as to each account disclosed during
credit reporting.
5. Evidence of Defendants' reinvestigation, procedures and results as to each account disclosed during
credit reporting.

As to all Defendants, statutory damages in the amount of \$1,000.00 each for violation(s) of the Fair Credit Reporting Act, and \$5,000.00 for punitive damages, emotional distress, and/or any other relief available by a jury;

D. For inspection and copying as under Rule 34, any insurance or bond agreement under which an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payment made to satisfy the judgment.

Respectfully submitted this 25th day of August, 2020.

By: Rajwinder Kaur
Plaintiff, In *Pro Per*
Without prejudice

CERTIFICATE OF SERVICE

I, Rajwinder Kaur, certify that a true and correct copy of PLAINTIFF'S RULE 26(a)(1) DISCLOSURES, was served via electronic mail to all counsel of record on August 25th and placed in an envelope with proper postage affixed, and mailed on August 25, 2020 via US Postal Service, First-Class mail as follows:

Original and 1 copy to:

United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Copies to:

JONES DAY
Ashley D. Burman
250 Vesey Street
New York, NY 10281

Copies to:

SEYFARTH SHAW LLP
Courtney Stieber
620 Eighth Avenue
New York, NY 10018

SCHUCKIT & ASSOCIATES, P.C.
Camille Nicodemus, Esq.
4545 Northwestern Drive
Zionsville, IN 46077

Date: August 25th, 2020

/s/ Rajwinder Kaur

By: _____